



Melissa A. Geist
Direct Phone: +1 609 514 5978
Email: mgeist@reedsmit.com

Reed Smith LLP
506 Carnegie Center
Suite 300
Princeton, NJ 08540-7839
+1 609 987 0050
Fax +1 609 951 0824
reedsmit.com

April 30, 2024

Via ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

Re: *In re Allergan Textured Breast Implant Products Liability Litigation, MDL No. 2921*

Dear Judge Martinotti:

The parties have conferred regarding the upcoming May 6 Case Management Conference relating to the above matter and hereby request a later start time for the conference, if available.

Per the Court's March 1, 2024 order, lead and liaison counsel were scheduled to arrive at the May 6 Conference by 10:00 am and all other counsel were scheduled to appear at 12:00 pm via dial-in. The parties hereby request that the conference start times be modified to 2:00 pm for arrival of lead and liaison counsel and 3:00 pm for dial-in by all other counsel, if the Court is able to accommodate the parties. If accommodation is not possible, the parties request the 10 a.m. conference go forward.

Although the parties do not have any specific disputed agenda items to present, the Plaintiffs wish to discuss the important work completed since the last conference and the anticipated progress on other matters. The Plaintiffs believe it would be beneficial to proceed with the conference, consistent with the Court's comments at the last in-person conference.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

Melissa A. Geist

Melissa A. Geist

MAG:al

cc: All Counsel of Record